

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION IV  
POLLUTION REPORT No. 17**

**Holtra Chem Chlor-Alkali Facility  
One Industrial Drive  
Riegelwood, Columbus County, NC**

TO: S. Hitchcock, EPA  
R. Donald Rigger, EPA  
G. Tan, EPA  
R. Davidson, EPA  
J. Bateson, NCDENR  
J. Stanley, NCDENR  
B. Nelms, NCDENR  
S. Carbonaro, EPA  
S. Urquhart-Foster, EPA

FROM: Charles E. Fitzsimmons, OSC  
4930 Old Page Rd.  
RTP, NC 27709

DATE: May 01, 2003

**I. BACKGROUND**

Site No.:	A47J
Delivery Order No.:	N/A
Response Authority:	CERCLA
Incident Category:	<b>State Referral</b>
CERCLIS:	NCD097361018
NPL:	N
Site Category:	Industrial Chlor-alkali Facility
Responsible party:	Holtra Chem LLC, Honeywell Inc.

**II. HISTORY**

Refer to Action Memorandum, Consent Order, and previous POLREPs for site history.

**III. SITUATION**

Refer to initial and routine POLREPs for site situation.

#### **IV. SITE ACTIVITIES**

During this reporting week, on-site removal activities were conducted April 28 thru May 02, 2003. OSC Fitzsimmons provided on-site oversight of removal activities May 1 and May 2, 2003. Weather conditions for the most part consisted of mild temps, 60sF - 70, and overcast skies, ideal conditions for heavy labor and mercury decontamination activities.

##### **April 28 thru April 30**

\* Demolition of the concrete bleach plant and removal of concrete debris was major focus this week. Work included the utilization of crane to pick the pre-casted lids from the top of the vats, power washing of the vat interiors, and demolition of the concrete vats. Debris is scanned using the lumex and then taken to an area near the former north pond to be used as fill material.

\* URS removed, disassembled and power washed cell covers for cell #15. Three transport cylinders for elemental mercury reclaim purposes were received this week. URS continued removal of contaminated materials from within the cell building to rolloff boxes staged outside. Refer to VI. Disposal Summary below for summary of rolloff boxes shipped this week. A truck wash for decon of truck tires was constructed at gate. Truck wash will be used if lumex indicates tires are contaminated.

##### **May 01 and 02, 2003**

At the request of the OSC and as a result of relatively high mercury vapor readings found in the contamination reduction zone, and office areas, START and the SSO were asked to perform mercury vapor monitoring inside the site workers' vehicles. This would help to determine if mercury laden particulate was being trekked off-site and also help to determine if additional cross-contamination minimization measures were necessary. Readings were taken using the Lumex mercury vapor analyzer. Readings were taken during the hottest part of the day, however temps were only in the mid 70s. Most of the readings inside were background or slightly higher. However, one reading came back at 2000ng/m<sup>3</sup> (2 ug/m<sup>3</sup>). This reading was taken from a contractor's vehicle who does not remove footwear at the end of the day, whereas the primary removal contractor personnel are required to change out their footwear prior to departing the site. Measures will be taken to clean the vehicle and to perform Lumex vapor analysis within the impacted party's residence.

Work activities centered around demolition of the concrete bleach plant vaults. Most of the bleach plant vaults have been demolished. Several truckloads of the rubble have been placed as fill in a low lying area west of the North Rainwater Pond. This rubble will be broken down to smaller pieces and rebar less than 1 foot will be removed.

URS personnel initiated work on the dismantling of cell #16 by removing the cell cover. URS to install support columns to cell units. Some of the existing concrete columns were found to be in

advanced stages of degradation with rebar in some columns exposed. These temporary columns will assist with the overall structural stability of the building.

EPA-Start contractor, at the direction of the OSC initiated an indoor command post/office area mercury sampling event. Samples were collected in the following locations 1) EPA office central hallway, 2) clock alley by entrance to large conference room, 3) dirty locker room, and 4) prep building.

### **General Air Monitoring Results**

Mercury vapor levels in the cell building ranged from 0.011 to 0.398 mg/m<sup>3</sup>. Overall levels were lower this week. The basement sump pit area and the cell pit continue to be Level B Work Zones due to elevated numbers. All other areas remain at level C work. Perimeter mercury vapor levels ranged from <10 to 51,000 ng/m<sup>3</sup>, well below the action level. Air monitoring levels, using the lumex at off site residential locations, were less than 10ng/m<sup>3</sup>.

### **V. FUTURE ACTIVITIES**

No EPA OSC oversight week of 5/5 due to ERRB mandatory training in Atlanta.

Complete demolition/removal of the bleach vaults and transportation of the rubble to fill area. Removal of cleaned elemental mercury to transport cylinders. Continue with the erection of temporary support columns within the cell building.

The next All-Hands Meeting is scheduled for 12:30 PM on Tuesday, May 28, 2003.

### **VI. DISPOSAL SUMMARY**

Disposal Summary for Week of April 28, 2003			
Waste Stream	Disposal Destination	Quantity Shipped This Week	Quantity Shipped To Date
Hazardous - Micro	Waste Management - Emelle Treatment Facility Emelle, AL	none	(9) 25-yd boxes (2) 20-yd boxes
Hazardous - Macro (Including ACM Hazardous)	Waste Management - Emelle Treatment Facility Emelle, AL	none	(15) 20-yd boxes
D009 (Wastewater Filter Cake)	EQ - Michigan Disposal Waste Treatment Belleville, MI	none	(3) box (est.66,840 lbs)

Disposal Summary for Week of April 28, 2003			
ACM (Non-Haz)	Anson Waste Management Facility Polkton, NC	Task Complete	(3) 40-yd boxes
Non-Haz Construction Debris	Sampson Co. Disposal Facility Roseboro, NC	none	(7) 30-yd boxes
Non-Haz Scrap Metal	Southern Metals Recycling Wilmington, NC	three (33,180 lbs.)	132,366 lbs
Non-Haz Scrap Titanium	Southern Metals Recycling Wilmington, NC	none	None
Non-regulated material (Directly Landfilled)	Waste Management-Emelle Treatment Facility, Emelle, Al.	one (25 yd box)	(7) 25 yard boxes
Non-haz scrap copper	Southern Metals Recycling Wilmington, NC	none	none
Reclaimed Elemental Mercury (for Reuse)	Goldsmith, Evanston, Il	none	(5) 1 ton cylinders